

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 156

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, proposed counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On November 23, 2022, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion of the Debtors for Entry of an Order Authorizing the Debtors’ Assumption of, and Entry into, the Custodial Services Agreements* [D.I. 156] (the “Motion”).

2. As of the date hereof, no formal objection or other responses to the Motion have been filed or served on the Debtors. The Debtors received informal comments (the “Informal Comments”) to the proposed form of order filed with the Motion from the United States Trustee (the “U.S. Trustee”), Official Committee of Unsecured Creditors (the “Committee”), the Securities and Exchange Commission (the “SEC”) and joint provisional liquidators of FTX Digital Markets Ltd. (the “JPLs”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

3. To resolve the Informal Comments, the Debtors have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Order compared against the proposed order attached to the Motion is attached hereto as **Exhibit B**. The U.S. Trustee, the Committee, the SEC and the JPLs have no objection to the entry of the Revised Order. Additionally, BitGo Trust Company, Inc. as counterparty to those certain Custodial Services Agreements (as defined in the Motion) has no objection to entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

4. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: January 8, 2023
Wilmington, Delaware

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/s/ Kimberly A. Brown

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*Proposed Counsel for the Debtors
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